

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

PURZEL VIDEO GMBH,

Plaintiff,

V.

Case No. 1:13-cv-02501

DOES 1-84,

Defendants.

PLAINTIFF'S MOTION FOR LEAVE
TO TAKE DISCOVERY PRIOR TO RULE 26(f) CONFERENCE

COMES NOW Plaintiff, Purzel Video GmbH and respectfully moves this Court, for Leave to take Discovery Prior to the Rule 26(f) Conference. Specifically, Plaintiff seeks leave of Court to serve limited discovery prior to a Rule 26(f) conference on non-party ISPs to determine the true identities of the John Doe Defendants and for all other relief as this Court deems just and proper. Plaintiff incorporates herein the reasoning set forth in its accompanying Memorandum. Plaintiff provides a Proposed Order based on the Order used in *Sunlust Pictures, LLC v. Does 1-75*, No. 1:12-cv-1546, Docket No. 11 (N.D. Ill. Mar. 14, 2012) (Pallmeyer, J.).

WHEREFORE Plaintiff Purzel Video GmbH respectfully moves this Court for Leave to take Discovery Prior to the Rule 26(f) Conference and for all other relief as this Court deems just and proper.

Respectfully submitted,
PLAINTIFF PURZEL VIDEO GMBH

By its attorneys,
SIMMONS BROWDER GIANARIS
ANGELIDES & BARNERD LLC

Dated: April 4, 2013

By: /s/ Paul A. Lesko
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CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2013, I electronically filed the foregoing pleading with the Clerk of the Court by using CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

/s/ Paul A. Lesko